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IN THE UNITED STATES DISTRICT COURT
FOR THE DISTRICT OF ALASKA AT ANCHORAGE

FOREST OIL CORPORATION and PACIFIC
ENERGY ALASKA OPERATING LLC,

Plaintiffs,

v.

UNION OIL COMPANY OF CALIFORNIA
d/b/a UNOCAL ALASKA,

Defendant.

Case No. 3:05-cv-00078-RRB

**STIPULATED MOTION TO AMEND
SCHEDULING AND PLANNING ORDER**

The parties request that various deadlines in the January 29, 2008 Scheduling and Planning Order (Docket #117) be vacated and revised. This request arises from actions being taken by the parties which will impact the scope of this litigation and the issues which remain to be addressed. These actions include the following:

1. Plaintiff Forest is planning to file and serve a substantial amendment to its complaint. The amended complaint will totally eliminate certain counts and limit the unresolved issues in Count IV which the Court is being asked to address. Forest believes this amended complaint will be filed and served by June 30, 2008.

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2. Defendant has filed and served a motion addressing whether plaintiff Forest continues to own any of the claims which it seeks to pursue in this case in light of the transfer of interests in the Trade Bay Unit to plaintiff Pacific Energy. Additional briefing remains before this motion will be ripe for decision. The parties anticipate this motion will be fully briefed and ripe for decision by the end of June 2008.

In light of these actions, the parties agree that the previously-established deadline for expert disclosures should be vacated. Among other things, substantial unnecessary expense will be incurred by the parties should their respective experts be required to address issues which will be beyond the scope of the litigation.

Further, the June 16, 2008 deadline for final witness lists, the August 8, 2008 deadline for close of discovery, and the September 8, 2008 deadline for discovery motions, motions *in limine* and dispositive motions should also be vacated. The parties believe, and request that discovery should remain open, and that new deadlines for expert disclosures, close of discovery, and filing of motions should be established by the Court by an amended scheduling and planning order to be issued shortly after the Court's ruling on defendant's motion referenced in paragraph no. 2, above.

This motion has been discussed with and agreed to by counsel for the other parties.

DATED this 5th day of June, 2008.

LANE POWELL LLC
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I certify that on June 5, 2008, a copy of
the foregoing was served by ECF on:

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s/ Brewster H. Jamieson
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